



**THE CITY OF NEW YORK
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February 1, 2023

VIA ECF

Honorable William F. Kuntz
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Cassandra Alexander, et al., v. City of New York, et al.
21-CV-5816 (WFK) (LB)

Your Honor:

I am a Senior Counsel in the Special Federal Litigation Division of the New York City Law Department, and the attorney representing defendants City of New York ("City"), Manny Sharma, James Priore, and Damon Martin (collectively "defendants"), in the above-referenced action. Defendants write, on behalf of the parties, to jointly request an extension of time, from February 6, 2023 to March 6, 2023, to file oppositions to the parties' respective summary judgment motions. The parties further request an extension from February 27, 2023 to March 27, 2023 to file reply briefs. This is defendants' first request for an extension of time to file these briefs.

The primary reason for this request is that Ramy Louis recently left the Law Department and the undersigned has just taken over this case. In order to allow sufficient time to get up to speed on the case and to prepare briefing in response to these dispositive motions, the parties are requesting a short extension of time in which to file their oppositions and replies.

Accordingly, the parties respectfully request an extension, from February 6, 2023 to March 6, 2023 to file oppositions to the cross-summary judgment motions. The parties further request an extension from February 27, 2023 to March 27, 2023 to file their replies. Defendants thank the Court for its time and consideration in this matter.

Respectfully submitted,

/s/ *Erica Bianco*

Erica Bianco
Senior Counsel

cc: Robert Howard Rickner, Esq. (via ECF)
Stephanie Panousieris, Esq. (via ECF)
Attorneys for plaintiffs